

EXHIBIT A

GIRARDI | K E E S E
LAWYERS

September 23, 2020

Re: 3:18-CV-15598 - Felicia Hill-Porter v. Johnson & Johnson, et al.

Dear Counsel,

I write to you with respect to the Court's September 17 and 18, 2020 Order(s) concerning service of complete fact sheets and verifications/authorizations.

Specifically, I make this statement to show cause as to why a complete fact sheet and verifications/authorizations will not be uploaded onto MDL Centrality by the Court-ordered deadline of September 25, 2020.

On September 1st, while attempting to contact Felicia Hill-Porter, legal representative of decedent Dorothy Hill, my firm confirmed that her phone number had been disconnected. We subsequently sent out correspondence by email and mail to the last known address we have for Ms. Hill-Porter. We have not yet received a response. We have also conducted independent database searches to attempt to find new contact information for Ms. Hill-Porter but have not yet been successful.

Despite our best efforts, we have not been able to resolve the outstanding deficiencies relating to Ms. Hill-Porter's Plaintiff Profile Form or the verifications and authorizations.

We respectfully ask Counsel and the Court to afford our law firm additional time to locate and correspond with Ms. Hill-Porter so that her case may be resolved on the merits rather than this procedural issue that is currently outside of our control.

With kind regards,



KEITH D. GRIFFIN